

REMARKS

This amendment is responsive to the Office Action of April 23, 2009. Reconsideration and allowance of claims 1-11 and 13-21 are requested.

Election

The applicant elects Group A, the claims drawn to an apparatus for notifying users that they are moving out of coverage area, with traverse. Group A includes independent claim 1 and claims 2-11 and 16-20 dependent therefrom.

It is submitted that claim 1 and claim 13, although related as method and apparatus, have a common technical feature and should be examined together. More specifically, it is submitted that the apparatus of claim 1 and the method of claim 13 parallel each other so closely and completely that the method of claim 13 cannot be performed by other than the apparatus of claim 1 and the apparatus of claim 1 cannot be used to perform a method other than the method of claim 13.

Claim 1 calls for an apparatus which comprises two means and claim 13 calls for a method which comprises two steps. Specifically, claims 1 and 13 call for:

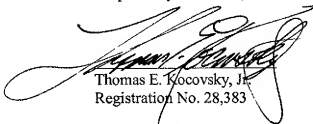
Claim 1	Claim 13
means for establishing a connection with a network in communication with a central monitoring station; and	establishing a connection with a network in communication with a central monitoring station; and
means for transmitting an audio or visual signal as the user moves out of the coverage area of the network.	transmitting an audio or visual signal as the user moves out of the coverage area of the network.

Because claim 1 calls for means for performing each of the steps of claim 13, it is submitted that claim 13 can only be performed by the apparatus of claim 1 and, conversely, that the apparatus of claim 1 can only perform the method of claim 13. Moreover, due to the parallel language of claims 1 and 13, it is submitted that both claims set forth a common "special technical feature" which ties the two Groups together.

An early withdrawal of the Restriction Requirement and a first Office Action on the merits of claims 1-11 and 13-21 is requested.

In the event the Examiner considers personal contact advantageous to the disposition of this case, the Examiner is requested to telephone Thomas Kocovsky at 216.363.9000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas E. Kocovsky, Jr.", is written over the typed name and registration number.

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